

**KNOX
McLAUGHLIN
GORNALL
& SENNETT**

A Professional Corporation

120 West Tenth Street
Erie, Pennsylvania 16501-
1461
814-459-2800
Fax 814-453-4530
www.kmgslaw.com

RICHARD H. ZAMBOLDI
JACK M. GORNALL
HARRY K. THOMAS
MICHAEL A. FETZNER
MICHAEL J. VISNOSKY
DONALD E. WRIGHT, JR.
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TRACEY D. BOWES
BRYAN G. BAUMANN
NEAL R. DEVLIN
NADIA A. HAVARD
ELLIOTT J. EHRENREICH
TIMOTHY S. WACHTER

OF COUNSEL:
WILLIAM C. SENNETT
EDWIN L.R. McKEAN
HARVEY D. McCLURE

Mark J. Kuhar
814-459-9886 Ext. 250
mkuhar@kmgslaw.com

June 13, 2007

Via Hand Delivery

John J. Mead, Esq.
Scarpitti & Mead
1001 State Street, Suite 800
Erie, PA 16501

**RE: Wagner v. Crawford Central School District
C.A. No. 04-264 Erie**

Dear Jamie:

As we discussed yesterday, I am requesting the following stipulations at trial:

1. (a) Beginning in August 2001 through the current date, Franklin Area School District hired 44 regular/permanent elementary teachers who did not have bidding rights under that district's collective bargaining agreement with its teachers' union. Conneaut School District hired several regular/permanent elementary teachers and Penncrest School District hired 15 regular/permanent elementary teachers under the same circumstances during the same period.

(b) Rowena Wagner has never applied for employment with any of these three school districts.

(c) At relevant times, Rowena Wagner had the qualifications necessary to be considered for these positions.

(d) The wages and benefits these districts provide to their teachers are as set forth in the enclosed collective bargaining agreements and summary, and they are comparable to those provided by Crawford Central School District. The positions at these districts are substantially equivalent to the employment she sought with Crawford Central School District.

JT, #1
CA No 04-264E

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2. In lieu of Daniel Hootman's testimony, we will stipulate that he has been Association President for several years and has held numerous other leadership positions within the Crawford Central Education Association during his employment with the District, and we will then read into the records his testimony at pages 35 – 40 of his deposition.

3. In lieu of Attorney Richard McEwen's testimony, we will stipulate that the enclosed summary of the racial and other characteristics of PSEA's statewide membership is accurate, and was prepared from documents kept in the ordinary course of PSEA's operations.

4. We will offer as a stipulated exhibit the enclosed printout from the United States Census Bureau which shows the number of people of the Asian race, and other minorities, residing in Crawford County relative to the County's population.

5. The August 6, 2004 Findings of the Investigation was issued by the Pennsylvania Human Relations Commission at the conclusion of its investigation of Rowena Wagner's February 2003 EEOC/PHRC charge of discrimination. This document will be submitted as a stipulated exhibit.

Not
agreed

Very truly yours,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

By:


Mark J. Kuhar

MJK/hm
Enclosures
#730714

agreed, with the exception of #5.


John J. Mead, Esq.

I agree with and acknowledge the foregoing stipulations for the trial of the above-referenced matter.